

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ASSOCIATION OF NEW JERSEY
RIFLE & PISTOL CLUBS, INC., et
al.

Plaintiffs,

V.

MATTHEW PLATKIN, et al.

Defendants.

MARK CHEESEMANN, et al.

Plaintiffs,

V.

MATTHEW PLATKIN, et al.

Defendants.

BLAKE ELLMAN, et al.

Plaintiffs,

V.

MATTHEW PLATKIN, et al.

Defendants.

Civil Action No. 3:18-cv-10507-PGS-LHG

Civil Action No. 3:22-cv-4360-PGS-
LHG

Civil Action No. 1:22-cv-4397-PGS-
LHG

**DECLARATION OF THOMAS ROGERS IN SUPPORT OF THE
MOTION FOR SUMMARY JUDGMENT OF ASSOCIATION OF**

NEW JERSEY RIFLE & PISTOL CLUBS, INC. (“ANJRPC”)
PLAINTIFFS AND *ELLMAN* PLAINTIFFS

1. My name is Thomas Rogers. My address is 3005 Clayton Drive, Wall Township, New Jersey 07719.

2. I am over the age of 18, have personal knowledge of the facts and events referred to in this Declaration, and am competent to testify to the matters stated below. I make this Declaration in support of the Motion for Summary Judgment of *ANJRPC* Plaintiffs and *Ellman* Plaintiffs

3. I am a plaintiff in this matter and a member of ANJRPC.

4. I am an adult citizen of the United States and resident of New Jersey. I do not fall within any of the exceptions enumerated in New Jersey’s ban on common semi-automatic firearms.

5. I am a long time, experienced firearms owner, having owned and responsibly used firearms for more than 40 years.

6. I wish to own common semi-automatic firearms for lawful purposes, including self-defense in the home. In particular, I would choose a common semi-automatic shotgun as an option for home defense because, as an experienced firearm owner, I believe that a common semi-automatic shotgun is ideally suited to my home defense needs. But for the ban, I would acquire and keep one or more common semi-automatic firearms in my New Jersey home. Because of New Jersey's ban and the associated criminal penalties, I refrain from doing so.

7. I would apply for a license to possess common semi-automatic firearms, but I know that such an attempt would be futile and he would be denied.

I declare under penalty of perjury that the foregoing is true and correct. Executed within the United States.


THOMAS ROGERS

Dated: October 6, 2023